

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-05-088

Alcan Primary Products Corporation

9404 highway 2096

Henderson, KY 42419

March 14, 2006

Min Wang, Reviewer

SOURCE I.D. #: 021-101-00029

SOURCE A.I. #: 1788

ACTIVITY #: APE20050001

SOURCE DESCRIPTION:

Alcan Primary Products Corporation produces 299,982 tons per year of aluminum ingot. Anodes for replacement in the cells are produced from coke that is crushed, sized and mixed with pitch to form a paste. This is then formed into anode blocks that are baked. Molten aluminum produced in the cells is alloyed and homogenized in gas-fired furnaces before being cast into ingots for shipment.

PUBLIC AND U.S. EPA REVIEW:

On February 8, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Gleaner* in Henderson, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received

Division of Air Quality of KY noticed that language in Operating Limitations for control devices was not accurate for Subject Item 2: New Process Sources, Subject item 4: Potlines, Subject 5: Green Anode Production, and Subject Item 6 Requirements: Anode Bake Furnace. "The associated control device(s) shall be operated all the time when the units are in operation except for routine or/and scheduled maintenance activities of control device(s)" has all been changed to "The associated control device(s) shall be operated all the time when the units are in operation" since the routine or/and scheduled maintenance activities of control device(s) scenarios have been covered under Section F.7.: Monitoring , Record Keeping and Reporting Requirements. For Subject Item 9: Natural Gas Usage, language "The visible emissions shall not exceed 20% opacity" has been added to Emission Limitations.

Comments were received from Alcan Primary Products Corporation on March 9, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Alcan Primary Products Corporation Draft Title V Air Quality Permit submitted by Jamie Coomes, Environmental Engineer.

Title V Permit

1. In Section B - Subject Item 1 the Unit # R2(01)(AI) is an insignificant source with less than 0.5 tons per year PM potential and should be moved to the insignificant section of the permit. This is a maintenance saw not a process saw.

Division's response: The Division has revised the permit as requested by the source.

2. In Section B - Subject Item 2 the Unit # R1(EH) is an insignificant source with less than 0.5 tons per year PM potential and should be moved to the insignificant section of the permit. This is a maintenance saw not a process saw.

Division's response: The Division has revised the permit as requested by the source.

3. In Section B – Subject Item 2, 1. Operating Limitations: item “f” on page 7 of 45 should be item “e”.

Division's response: The Division has revised the permit as requested by the source.

4. In Section B- Subject Item 4, Section 8 Compliance Certification has been omitted. This should state “See Section D 3 on page 32 below.”

Division's response: The Division has revised the permit as requested by the source.

5. In Section B- Subject Item 6, Section 8 Compliance Certification a.” All monitoring devices must be certified by the permittee to meet the accuracy requirements”. PMACT regulations specify many requirements, but to specify this one accuracy requirement in the compliance certification section does not seem appropriate. Therefore, we request that this specific statement be removed and reference only what is in b. “See Section D 3 on page 32 below” following the same format as the rest of the permit.

Division's response: Pursuant to 40CFR 63.848 (k), the owner or operator shall submit recommended accuracy requirements to the DAQ for review and approval. All monitoring devices must be certified by the owner or operator to meet the accuracy requirements and must be calibrated in accordance with the manufacturer's instructions. The Division of Air Quality has been trying to put specific language to the permit instead of referring to regulation(s) only, so the permit is easier to be implemented. This language has been deleted from Compliance Certification, and the similar language was added to Section 4: Specific Monitoring Requirement for Subject Item4: Potlines and Subject Item6: Anode Bake Furnace. The language added is as follows:

Procedures for the proper operation and maintenance of monitoring device(s) or system(s) used to determine compliance, including:

- i. The permittee shall submit recommended accuracy requirements to the DAQ for review and approval. [40 CFR 63.848 (k)]*
- ii. All monitoring devices must be certified by the permittee to meet the accuracy requirements and must be calibrated in accordance with the manufacturer's instructions. [40 CFR 63.848 (k)]*

6. In Section B – Subject Item 7, Paragraph 2 Emission Limitations, the Opacity Standard discussion should start with letter “a” not “b.” In addition, the PM Standard discussion should start with the letter “b” not “c,” and the sub-paragraphs should begin with “i.” not “iii.”

Division's response: The Division has revised the permit as requested by the source.

7. In Section B – Subject Item 7, Paragraph 2 Emission Limitations (page 26 of 45), there should be a paragraph that starts with the letter “c.” as follows:

- C.** Pursuant to 40 CFR 63 Subpart RRR, emissions from any Group 1 Furnace shall not exceed the following limits:
- i. Particulate emissions shall not exceed 0.4 lbs/ton of feed.
 - ii. Hydrochloric acid (HCl) emissions shall not exceed 0.4 lbs/ton of feed.

Division's response: The Division has revised the permit as requested by the source.

8. In Section B – Subject Item 9, the section addresses natural gas use only. We request that additional language be added to the Compliance Demonstration sentence as follows: (See italics)

2. Emission Limitations: The Particulate Matter emission shall not be more than 2.34 lb/hr. **Compliance Demonstration:** The permittee is assumed to be in compliance, *with the particulate matter limit*, while burning natural gas.

Division's response: The Division has revised the permit as requested by the source.

9. In Section D – Paragraph 4. – Please add the clarification statement (statement in italics below) to the following permit condition.

Compliance Demonstration: Compliance with the annual SO₂ emission limit shall be determined by computing the total primary aluminum production SO₂ emissions monthly using the Alcan SO₂ Calculation Engine; *(an example of the blank form can be found in the Kentucky Division for Air Quality tracking system “TEMPO”)* and calculating a rolling 12-month SO₂ emission total for the primary aluminum process (potlines and anode baking furnaces).

Division's response: The Division has revised the permit as requested by the source.

10. In Section F – Paragraph 11, the whole reference to 401 KAR 50:016 and the Division for Air Quality policy manual should be removed since this administrative regulation (50:016) was repealed effective 7/13/2005. The reference should read as follows with regard to the submittal of performance test results:

- 11. Pursuant to 401 KAR 50:045, performance testing required by the permit shall be conducted*

according to the timeline listed in 401 KAR 50:045. The Division requires that results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork.

Division's response: The Division has revised the permit as requested by the source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.